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14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 RENE GARCIA, an Individual,
18 Plaintiff,

19 vs.
20 AIDS HEALTHCARE FOUNDATION, a
21 Foreign Non-Profit Corporation, DOES I -
22 X; and ROE CORPORATIONS I - X.

23
24 Defendant.

25
26 **CASE NO.: 2:19-cv-00404-JCM-NJK**

27
28 **MOTION REQUESTING EXTENSION**
OF TIME TO FILE AN ANSWER ON
BEHALF OF DEFENDANT

29
30 Plaintiff Rene Garcia by and through his attorneys, Jenny L. Foley, Ph.D., Esq. and
31 Marta Kurshumova, Esq. of HKM Employment Attorneys LLP, hereby submits this Motion
32 Requesting Extension of Time to File an Answer on behalf of Defendant, AIDS Healthcare
33 Foundation and their counsel, Arti Bhimani, Defendant's Assistant General Counsel. The
34 parties have agreed as follows:

35 1. On or about March 25, 2019, Arti Bhimani, Assistant General Counsel for
36 Defendant, contacted Plaintiff's attorneys requesting a two-week extension to
37 respond to the Complaint. See Exhibit 1.

2. Plaintiff's counsel agreed to the extension. See Exhibit 1.
3. Defendant does not yet have local counsel and, therefore, the parties cannot file a stipulation.
4. In lieu of a stipulation for extension of time, Plaintiff hereby respectfully requests the Court to allow Defendant a two-week extension to file an answer.
5. Plaintiff and Defendant have agreed that the new due date for filing the answer is April 15, 2019.

Dated this 1st Day of April, 2019.

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ORDER

The Court having reviewed the foregoing MOTION REQUESTING EXTENSION OF TIME TO FILE AN ANSWER ON BEHALF OF DEFENDANT in the above-entitled matter and for good cause appearing therefore, Plaintiff's motion, Docket No. 6, is GRANTED.

IT IS SO ORDERED that the due date for Defendant's answer is moved from April 1, 2019 to April 15, 2019.

Dated: April 2, 2019

~~UNITED STATES MAGISTRATE JUDGE~~